

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

WILLIAM T. WHITMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM LIFE INSURANCE COMPANY,
an Illinois corporation

Defendant.

No. 3:19-cv-06025-BJR

DECLARATION OF LAUREN STIROH

1 I, Lauren Stiroh, have personal knowledge of the information below and declare as follows:

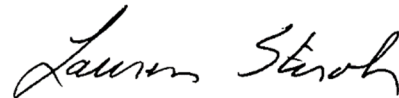
2 1. I am over the age of 18. I am competent to testify. I make this Declaration based
3 upon personal knowledge.

4 2. I am an economist and Managing Director of NERA Economic Consulting. NERA
5 provides research and analysis in the field of applied microeconomics, including the economics of
6 competition, healthcare, pharmaceuticals, regulation, and finance. A substantial portion of my
7 work, as well as NERA's consulting work, includes class certification and the determination of
8 economic damages.

9 3. Attached as **Exhibit A** is a true and correct copy of the March 29, 2021 report and
10 attachments that I prepared for the purposes of offering opinions in this matter. My report and its
11 attachments contain the bases for my opinions as well as my qualifications. The statements in the
12 report are true and correct to the best of my knowledge.

13 I declare under the penalty of perjury under the laws of the United States of America that
14 the foregoing is true and correct.

15 Executed this 29th of March, 2021 in Scarsdale, NY.

16
17
18 

19 Lauren Stiroh